

Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

DEVITTA BRISCOE, individually, and as
executor of the Estate of Che Andre Taylor;
JOYCE DORSEY, individually; CHE ANDRE
TAYLOR, JR., individually; and SARAH
SETTLES on behalf of her minor child, C.M.T,
and DEMEKA GREEN for the Estate of
Brenda Taylor,

Plaintiff,

vs.

CITY OF SEATTLE; MICHAEL
SPAULDING and "JANE DOE"
SPAULDING, and their marital community
composed thereof; SCOTT MILLER and
"JANE DOE" MILLER, and their marital
community composed thereof; TIMOTHY
BARNES and "JANE DOE" BARNES, and
their marital community composed thereof; and
AUDI ACUESTA and "JANE DOE"
ACUESTA, and their marital community
composed thereof,

Defendants.

No. 2:18-CV-00262-TSZ

**DECLARATION OF JESSE VALDEZ
RESPONSE TO EXHIBIT 3 POLICE
VIDEO CLIP DKT. 104**

I, JESSE VALDEZ, hereby declare as follows:

1. I am over the age of eighteen years and a citizen of the United States. I have personal
knowledge of the facts set forth herein and am competent to testify to them.

2. I am one of the attorneys of record for the plaintiffs in the above-entitled action

3. Ms. Noelle Knudsvig gave a fake name to officers on the date of the shooting when she gave her statement to officers.

4. There is evidence that Ms. Knudsvig was using heroin on the day of the shooting. Officer Timothy Barnes was disciplined for throwing away heroin he found on Ms. Knudsvig the day of the shooting. This was given to Plaintiffs via discovery.

5. Ms. Knudsvig has never been put under oath as to this incident. Ms. Knudsvig never testified at the inquest. Ms. Knudsvig has never been deposed in this case by anyone. No one outside of the law enforcement have been able to locate her and talk with her since the day of the incident.

6. Ms. Knudsvig also had a warrant out for her arrest on that day of the shooting and when she was giving a statement to officers.

7. Ms. Knudsvig line of sight was obstructed as she was sitting in the back seat of the White Ford Tarsus. The facts establish that Che Taylor never fired a shot at officers; however, Ms. Knudsvig states the officers fired back which further suggests she did not see what happened.

8. Plaintiffs have attempted to locate Ms. Knudsvig with no success.

I declare under penalty under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

SIGNED in Issaquah, Washington this 12th day for May 2020.

/s/ Jesse Valdez
JESSE VALDEZ